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BY ELECTRONIC FILING (Docket No. 06-36)

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Suite TW-A325
Washington, DC 20554

February 28, 2019

**Re: EB Docket No. 06-36; 2018 CPNI Compliance Certification
Inmarsat Inc.**

Dear Secretary Dortch:

Attached please find the 2018 CPNI Compliance Certification for Inmarsat Inc. (fka Inmarsat Mobile Networks, Inc.)

If you have any questions or comments, feel free to contact me at (202) 427-2483 or louis.rosa@inmarsat.com.

Respectfully submitted,

Louis Rosa
Attorney

Enclosure



Annual 47 C.F.R. §64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date Filed: February 28, 2019

Name of Company Covered by This Certificate: Inmarsat Inc. (fka Inmarsat Mobile Networks, Inc.)

Form 499 Filer ID: 804081

Name of Signatory: Louis Rosa

Title of Signatory: Attorney

I, Louis Rosa, certify that I am Attorney of the company named above ("Inmarsat"), and acting as an agent of Inmarsat, that I have personal knowledge that Inmarsat has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Inmarsat's procedures ensure that Inmarsat is in compliance with the requirements set forth in § 64.2001 *et seq* of the Commission's rules.

Inmarsat has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. Inmarsat has no information other than that available in the media and from the Commission regarding the processes that pretexters are using to attempt to access CPNI. As described in the accompanying statement, Inmarsat itself has established practices and procedures to protect CPNI.

Inmarsat has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Louis Rosa

Attorney

Inmarsat Inc.

Date: February 28, 2019

STATEMENT OF CPNI COMPLIANCE PROCEDURES

Inmarsat Inc., fka Inmarsat Mobile Networks, Inc., ("Inmarsat") has established and implemented the following internal policies and procedures to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), codified at 47 C.F.R. § 64.2001 *et seq.*

The responsibility for Inmarsat's CPNI policies and procedures resides with the company's Attorney, who has reviewed Section 222 of the Communications Act and the FCC's CPNI Rules (47 C.F.R. § 64.2001 *et seq.*) and is familiar with their requirements.

The following operating procedures ensure that Inmarsat is in compliance with the FCC's CPNI Rules:

1. Inmarsat does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by the law.
2. Inmarsat only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. Inmarsat does not use its customers' CPNI for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F.R. § 64.2001 *et seq.*
3. Inmarsat has established detailed written practices and procedures governing the disclosure of CPNI:
 - a. Inmarsat does not disclose or release CPNI upon a customer's telephone request except under the following circumstances: (1) Inmarsat verifies the identity of the caller by return call to the telephone number of record in the customer's file; (2) Inmarsat sends the CPNI to the customer's address of record in the customer's file; or (3) for business customers, through the customer's dedicated account manager.
 - b. With respect to telephone inquiries by customers concerning specific call-related issues, Inmarsat requires the customer to provide sufficient specific information about the call in question to confirm the customer's identity.
 - c. Inmarsat automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.
 - d. Inmarsat has implemented procedures to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.
4. Inmarsat provides comprehensive training on these practices and procedures to all relevant employees.
5. Because Inmarsat does not use CPNI for any purpose and does not provide CPNI to other entities (except when compelled by law to do so, or as requested to do so by customers), it has not implemented either "opt-in" or "opt-out" CPNI approval procedures set forth at Section 64.2007 of the Commission's Rules, 47 C.F.R. § 64.2007, and it has not implemented the CPNI

notification procedures set forth at Section 64.2008 of the Commission's Rules, 47 C.F.R. § 64.2008.

6. In the event that Inmarsat in the future plans to utilize CPNI or provide CPNI to other entities other than as described above, it will first provide customer's notification of their CPNI rights as required by the Commission's Rules 47 C.F.R. § 64.2008.
7. It is a violation of Inmarsat's policies to disclose CPNI outside of the Inmarsat corporate structure. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.
8. Access to CPNI at Inmarsat is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.
9. Strict controls are in place involving responses to law enforcement agencies that serve Inmarsat with valid legal demands, such as a subpoena, for CPNI. Inmarsat will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.

These procedures and policies have been specifically approved by Inmarsat's corporate officers.